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PORTER, WRIGHT,
MORRIS & ARTHUR
ATTORNEYS AT LAW

41 SOUTH HIGH STREET, COLUMBUS, OHIO 43215

TELECOPIER: (614) 227-2100

TWX: (810) 482-1702

DIRECT DIAL: (614) 227-2097

CHRISTOPHER R. SCHRAFF

1135 15TH STREET, N.W.
WASHINGTON, D.C. 20003
TELEPHONE: (202) 832-0840
TELECOPIER: (202) 832-9197
TELEX: (810) 482-1702

1610 ATRIUM ONE,
361 EAST FOURTH STREET
CINCINNATI, OHIO 45202
TELEPHONE: (513) 881-4700
TELECOPIER: (513) 421-0991

935 EUCLEID AVENUE
SUITE 1500 HUNTINGTON BUILDING
CLEVELAND, OHIO 44115
TELEPHONE: (216) 441-9000
TELECOPIER: (216) 441-9011

1100 FIRST NATIONAL BANK BUILDING
P.O. BOX 1803
DAYTON, OHIO 45401
TELEPHONE: (513) 228-2411
TELECOPIER: (513) 228-0600

June 7, 1988

Norma Jean Kraus Belt, Esq.
Office of the Attorney General
of Maryland
300 West Preston Street
Suite 302
Baltimore, Maryland 21201

Re: Ordnance Products, Inc. Site
Cecil County, Maryland

Dear Ms. Belt:

I am in receipt of your letter dated May 24, 1988, in which you indicate that the Maryland Department of the Environment ("Maryland DE") will not execute the Consent Order which was forwarded from Mr. Kevan Langner on March 15, 1988. You indicated in your letter that Maryland DE decided to "withdraw" the reference Consent Decree for two reasons: (1) KDI's "continued failure" to respond in a timely fashion to the State's request that a Consent Order be executed; and (2) changed conditions at the site. You then further note that, since March 15, the State has had no further contact with KDI or me respecting this matter.

For the record, KDI wishes to respond to certain comments in your May 24 letter. While I'm sure that the Maryland DE sincerely believes that KDI's response to its requests for an executed Consent Decree was tardy, the fact remains that KDI and Mechanics Valley Trade Center, Inc. installed carbon filtration systems in an expeditious manner, notwithstanding that no Consent Order has been negotiated or signed. While the Maryland DE may choose to regard KDI's submission of the negotiated Consent Order as "belated," the installation of the carbon filtration systems was completed in a timely fashion. Moreover, those systems have remained in place notwithstanding the absence of an executed Consent Order.

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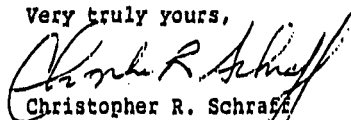
Norma Jean Kraus Belt, Esq.
May 31, 1988
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You further note that the Maryland DE also refuses to execute the Consent Order due to changed conditions at the site. KDI is unaware of any "changed conditions" at the site. Would you please inform me, at your earliest convenience, respecting those "changed conditions" which now prevent the Maryland DE from executing the Consent Order.

Finally, you note that my earlier letter of March 15, 1988 indicated that I would be contact you by the end of that week to discuss a further meeting between KDI and the Maryland DE, but that you never heard from me or KDI about such a meeting. Frankly, I would think that the reason for this was obvious: KDI was told, in no uncertain terms, that this matter was being referred to USEPA's Region III Office, and that any further communication should be with Region III.

In fact, since my last communication with you, KDI has been in touch with USEPA's Region III Office. While we have, to date, received no written communications regarding the Ordnance Products site, we have discussed with Mr. Richard Dulcey, of USEPA's Region III Office in Philadelphia, what measures USEPA regards as necessary for the site. We also are informed that the Maryland DE will be a signatory on any Consent Order. If this is the case, it will be necessary for Maryland DE to be involved in the negotiation of such a Consent Order.

Very truly yours,


Christopher R. Schrage

CRS:mkd

cc: K. Langner
R. Dulcey✓

PORTER, WRIGHT,
MORRIS & ARTHUR

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